1   of a situation, if Intermedia were to buy some of the NNIs that

2   were proposed in Mr. Wardin's testimony, what would that be

3   interconnected to?

4   A.   I'm not sure exactly what you're referring to.

5   Q.   It's my understanding, and correct me if I'm wrong, that

6   Ameritech's position here is that Intermedia may not

7   interconnect for the provision or transport and termination of

8   local frame relay service, but that it must buy the NNIs out of

9   Ameritech's local tariff; is that a fair statement?

10   A.   Again, we get into the semantics conversation that we had

11   before. I see a lot of value to enabling -- My definition of

12   interconnect is enabling carriers to talk to each other. I

13   certainly think that the tariff facilitates that; so again, I'm

14   not an expert in the legalese and the wordsmithing, but it's my

15   belief that the tariff facilitates the type of interconnection

16   that you're talking about.

17   Q.   Okay. If -- It's my understanding that Mr. Wardin's

18   numbers, I don't expect you to give me a number on that, but the

19   prices Mr. Wardin provided for -- in his testimony provide for

20   interconnection, that is the acquisition of NNIs outside of

21   Ameritech's framed relay tariff; is that --

22   MR. STEMM: Excuse me, your Honor. I would just ask

23   Jon, if you could, to show the witness whatever document from

24   Mr. Wardin's testimony that you're referring to, because

25   Mr. Whiting did not prepare Mr. Wardin's testimony or supporting

1   documentation.

2   EXAMINER JENNINGS: I think that would be helpful.

3   MR. STEMM: Just so we're clear on what we're talking

4   about here.

5   We should also just make clear for the record, as

6   we're about to do this, that the attachments to Mr. Wardin's

7   testimony are there only as kind of an alternative proposal in

8   the event that this Commission would overrule Ameritech's first

9   legal point and that is that framed relay is not interconnection

10 under 251(C)(2) as an interconnection telephone exchange

11 service.

12   (Document handed to witness.)

13   THE WITNESS: Thanks.

14 BY MR. CANIS:

15 Q.   Now, if I were to buy interconnection, and again, not

16 through a tariff, but through those -- the rate structure

17 proposed by Mr. Wardin, where would my NNI go to?

18 A.   You, as ICI would purchase -- we have an agreement as

19 outlined by this?

20 Q.   Yes.

21 A.   Well, on a technical level, it would go between our

22 switches.

23 Q.   Now, I have an interconnection agreement with Ameritech. I

24 would be interconnecting with an AADS switch, right?

25 A.   On a logical level, yes, but AADS is a subcontractor

1   providing switches; so you would be interconnecting with the

2   frame relay service, not the switching.

3   Q.   You said now it was on a logical level, how about on a

4   legal level? If AADS owns those switches, and this is not a

5   resale agreement, this is an interconnection agreement; so how

6   would I interconnect with AADS? Do I deal with AADS?

7   A.   I don't know from a legal perspective. Technically, that

8   connection would be between frame relay switches. The switch

9   being AADS's as a subcontractor to Ameritech and Ameritech would

10 act as the agent to facilitate that relationship.

11 Q.   We determined earlier that AADS is not a certified carrier

12 and is not rate regulated in Ohio; is that --

13 A.   That's my belief.

14 Q.   So AADS, when it prices its frame relay, it is not bound by

15 TELRIC studies or cost studies that are subject to the approval

16 of this Commission or cost studies that are required by the

17 Communications Act of 1996; is that true?

18 A.   When AADS prices its switch services that it provides to

19 Ameritech --

20 Q.   Uh-huh.

21 A.   -- that's true.

22 Q.   So if I interconnected with Ameritech for the transport and

23 termination of local frame relay service, I would have no way of

24 knowing whether the rates that I was paying for that connection

25 were based on TELRIC and reflected forward-looking costs or

1 additional costs?

2 A. I don't think I know the answer to that.

3 MR. STEMM: We would just point out that Mr. Wardin is

4 here also to answer cost questions.

5 BY MR. CANIS:

6 Q. And similarly, when Ameritech buys its switching function

7 from AADS, that is used in the provision of its local frame

8 relay service?

9 A. Uh-huh.

10 Q. The cost component associated with the frame relay switch

11 is not regulated?

12 A. I don't believe so.

13 Q. Let me ask you a hypothetical question. If under this

14 situation that you've explained, AADS owns the switches that are

15 used by Ameritech in the provision of both its tariffed and its

16 frame relay tariff service and its -- and any interconnect,

17 pursuant to 251 and 252 of the Act, that because all the

18 switches are held by an unregulated entity, Ameritech may drive

19 the switching cost component associated with the frame relay

20 switch to levels well above incremental cost or TELRIC or,

21 frankly, any kind of cost that was reviewed or approved by this

22 Commission?

23 MR. STEMM: I would object to the, first of all, the

24 question on a number of grounds; the form of the question, that

25 it was hypothetical. There has been testimony that AADS does

1   own the switches; it's not hypothetical.

2   And it's a cost question. If this witness can an. r

3   it, fine; if he can't, perhaps someone else can.

4   And third, I think the question is misleading bec ə

5   the FCC has approved a tariff which has the switching costs

6   approved in it; so it is regulated to that extent.

7   MR. CANIS: I'm sorry, is this --

8   MR. STEMM: That is the extent of my --

9   MR. CANIS: -- opposition to my question, or you

10 answering the question?

11   MR. STEMM: That is the extent of my objection.

12   EXAMINER JENNINGS: I'm going to sustain the

13 objection. I believe the questions of cost are getting out ə

14 the focus of this witness' testimony.

15   THE WITNESS: The only thing I can add is competi ə

16 pressures keep the cost of the frame relay competitive. Th 's

17 a lot of talk about anticompetitiveness, and I think we nee ɔ

18 differentiate as Ameritech as the local exchange carrier an ıe

19 market share and the power that Ameritech holds and Amerite

20 frame relay.

21   I mean, we are really a -- As product manager, I'

22 very aware of this. We have a very low market share. When ı

23 talk about the assets we have in the ground, we're a minusc

24 player right now in the frame relay market. So the competi ı

25 forces me, as product manager, to make sure our prices are

1   line with our costs.

2   BY MR. CANIS:

3   Q.   So Mr. Whiting, along the lines of your answer, you are

4   involved with costing these products and you are aware of the

5   impact of competition on costing decisions made by Ameritech?

6   A.   The only way I'm involved is knowing what price we can

7   bring to market and then pushing back to see if there's anything

8   that can be done on the cost. I don't really have a personal

9   involvement with any of the cost work.

10 Q.   Okay. But you are aware of the impact that competitive

11 pressures put on Ameritech's pricing policies; is that the case?

12 A.   On any carrier's policies.

13 Q.   Fair enough. When AADS buys its own frame relay service

14 from Ameritech, and when Ameritech buys the switching component

15 for that service from AADS, is there a competitive pressure? Do

16 you have two carriers at arm's length that are both seeking

17 economically efficient costs for the services they provide to

18 each other?

19 A.   I guess I can answer that a couple of ways. The

20 relationship between Ameritech and AADS, there are competitive

21 market pressures that dictate the costs that are acceptable to

22 Ameritech from AADS and levels of service.

23   As far as Ameritech reselling this, again, the competing

24 sales channels actually compete with each other to deliver

25 things to the end customer; so there's additional pressure on

1 keeping the prices, and I guess costing, in line.

2 Q.   When frame -- When Ameritech buys its frame relay

3 functionality from AADS, doesn't it just pass along the cost of

4 that to its end user customers?

5 A.   In most cases, yes.

6 Q.   So how does that create downward competitive pressure to

7 drive down the cost of the switching functionality that AADS

8 provides?

9 A.   Well, if the price to the -- if the price to the end

10 customer is too high, it's going to be pushed back to AADS to

11 run the network more efficiently, perhaps implement new

12 switching architectures that drive costs down; so they're able

13 to pass on a lower cost to their customer, Ameritech.

14 Q.   Well, do you know why AADS buys tariffed framed relay

15 service from Ameritech as opposed to seeking interconnection

16 with Ameritech?

17 A.   I'm not sure I understand the question.

18 Q.   Well, I think the -- It's my understanding that the reason

19 Intermedia is here is because it feels that buying frame relay

20 service out of the same tariff that AADS currently buys out of

21 grossly inflates the cost of frame relay and that ICI can get a

22 better deal and cheaper rates if it pursues interconnection

23 under 251, 252 of the Act.

24   MR. STEMM: I mean, I -- To the extent the witness can

25 answer as to what ICI's thinking process and hearing strategies

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1   are, I think he can try to do that.

2   MR. CANIS: Just to clarify, I'm not asking the

3   witness to speculate about ICI's motivation. I think I just

4   explained that I'm asking him to speculate as to why AADS has

5   not sought similar methods of obtaining lower costs from

6   Ameritech.

7   MR. STEMM: We would just object to having the witness

8   speculate about anything.

9   EXAMINER JENNINGS: This does appear to be outside the

10 scope of the witness' testimony.

11   MR. STEMM: Yeah, that's a good point there.

12 BY MR. CANIS:

13 Q.   Okay. I'd like to direct you back to your direct testimony

14 on Page 9. Oh, okay. Well, let me ask this.

15   In response to the question on Line 17 and 18 of Page 9,

16 the question there is: "Is frame relay fully substitutable with

17 traditional voice telephony"; do you see where I am?

18 A.   Yes.

19 Q.   And the response there on Line 19, the answer starts with

20 the phrase "Certainly not."

21   May I direct your attention to the verified statement of

22 yours that is appended to Ameritech's Ohio's motion to deny

23 petition, and I'll bring this page over to you. There's the

24 same question. May I ask you to read the initial response to

25 that same question?

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1   A.   It's a different question.

2   Q.   Okay. Can you discuss those, please?

3   A.   Sure. My original answer -- "Is the frame relay network

4   similar to the public telephony switch network?" And my answer

5   at that point in time "For the most part, it's not."

6   And I guess as it changes through time, "Is frame relay

7   fully substitutable with traditional voice telephony," I felt

8   the need to strengthen my response to that because it really is

9   not.

10   So voice communication is -- you're capable to do that

11   across frame relay. It's not designed for it. It's completely

12   different structurally from traditional voice telephony.

13   There's also a lot of quality concerns and, again, we do support

14   the service over Ameritech frame relay and our end customers

15   have noticeable differences in the quality, and there's a few

16   other differences I outline in my testimony.

17   Q.   I'll take my page back.

18   A.   Sure.

19   (Handed.)

20   Q.   Now -- Well, actually, I better give this to you again. In

21   your response there, "For the most part, it is not," may I ask

22   you to explain why the equivocation?

23   .   MR. STEMM: I'm sorry, Jon, what page are we on?

24   MR. CANIS: This is Page 7 -- Page 8 of the verified

25   statement.

1   MR. STEMM: Thank you.

2   BY MR. CANIS:

3   Q.   And basically, could I just ask you to explain again why

4   you said "For the most part"?

5   A.   "For the most part, it is not," is what I said.

6   Q.   Well, and I assume that means that for some part it is, and

7   could I ask you to explain that part?

8   A.   Sure.   Again, this original verified statement was more in

9   laymen's terms.   I thought my purpose was to explain things to

10 the Panel, and I wasn't sure of the technical expertise; so I

11 did.

12   In general, you can have a voice conversation over a frame

13 relay, and that's what I was trying to get after.   When I saw

14 some of the comments coming back talking about how it's fully

15 substitutable, I thought I really needed to strengthen my

16 comments.   If you were to have a conversation over a frame

17 relay, it is extremely likely you would notice some quality

18 difference.   You could only call people on your own network, you

19 could only use proprietary premises.   We're barring some recent

20 developments in the Frame Relay Forum.   I was just strengthening

21 my comments.

22 Q.   Okay.   Let me take my page back.   Thank you.

23   (Handed.)

24   Are you a member of the Frame Relay Forum?

25 A.   Yes.

1 Q.   Is Frame Relay Forum establishing standards for voice

2 telephony over frame relay at this point?

3 A.   Yeah.   As I just stated, an implementation agreement, which

4 is basically the standard of the Frame Relay Forum agrees to

5 amongst all its members, was just ratified by a means by which

6 to allow voice-over relay, but again, that by no means makes it

7 fully substitutable.

8 Q.   What is the purpose, though, of establishing these

9 standards?

10 A.   To enable -- Really, Frame Relay Forum is driven by the

11 customer premises equipment vendors and enables them to sell

12 more if they can interconnect with other types of equipment that

13 aren't theirs.

14 Q.   But is the goal ultimately of this exercise

15 substitutability between frame relay, voice telephony and public

16 switch voice telephony?

17 A.   No.

18 Q.   Besides frame relay, are there other connection-oriented

19 services that use the public switch network?

20 A.   Yes.

21 Q.   Could you name some?

22 A.   One I can think of is asynchronous transfer mode.

23 Q.   Uh-huh.   As SMDS?

24 A.   I wouldn't categorize that as connection oriented, that's

25 connections.

1   Q.   How about Internet access?

2   A.   I would not qualify that as a technology. That's merely a

3   path.

4   Q.   Is it your position that these other services, like

5   asynchronous transfer mode, should be excluded from

6   interconnection agreements under 251 and 252 of the Act?

7   MR. STEMM: Just object to the extent it calls for a

8   legal conclusion. And are you asking the witness for his

9   personal opinion, or whether he knows if Ameritech has a

10   position on that particular issue?

11   MR. CANIS: Well, let's break that out.

12   BY MR. CANIS:

13   Q.   Is it your position that connection orient- -- that frame

14   relay is not subject to interconnection under the Act because it

15   is a connection-oriented service?

16   MR. STEMM: Objection, again, to the extent it calls

17   for a legal conclusion, which we've already briefed.

18   EXAMINER JENNINGS: I'm going to sustain the

19   objection.

20   BY MR. CANIS:

21   Q.   So again, it is your conclusion that frame relay is a

22   connection-oriented service?

23   A.   Yes.

24   Q.   And you have no opinion as to whether that -- the fact that

25   it is connection oriented renders it subject or not subject to

1   interconnection under 251 to the Act?

2   MR. STEMM: Objection as the same grounds as before.

3   MR. CANIS: I just want to know if he has an opinion

4   or not.

5   MR. STEMM: It's been determined to be irrelevant

6   before.

7   EXAMINER JENNINGS: Sustained.

8   BY MR. CANIS:

9   Q.   Do you know what is Ameritech Information Industry

10   Services?

11   A.   I know it's a business unit of Ameritech.

12   Q.   Do you know what it does?

13   A.   I believe it provides -- it is a sales channel to provide

14   service to other carriers, although, I'm not extremely sure of

15   the specifics.

16   Q.   Are you familiar with the answers provided in Ameritech's

17   responses to Intermedia's data request and information request?

18   A.   I've read through a whole bunch of stuff; so I'd like to

19   see, you know, whatever we're going to talk about. Probably, I

20   probably have reviewed everything.

21   Q.   Do you have a copy of that?

22   A.   No.

23   (Handed.)

24   Thanks.

25   Q.   Can I bring your attention to Page 9, response to question

1   ICI No. 7, subsection B?

2   A.   Okay.

3   Q.   And that second sentence, "AADS purchases interoffice

4   transport from Ameritech Information Industry Services and

5   interexchange carriers for the transmission of frame relay

6   traffic pursuant to tariff"?

7   A.   Uh-huh.

8   Q.   In light of that, can you tell me what Ameritech

9   Information Industry Services is?

10 A.   They are the sales channel which provides facilities to

11 Ameritech Advanced Data Services on behalf of Ameritech.

12 Q.   Are they separate from Ameritech Ohio?

13 A.   I'm not sure how that all works.

14 Q.   So do you know, are they a certificated carrier?

15 A.   I'm not sure.

16 Q.   Do you know if they maintain their own tariffs?

17 A.   AIIS?

18 Q.   Uh-huh.

19 A.   I don't believe so; I'm not sure.

20 Q.   Okay. Let me direct your attention to Page 14.

21   MR. STEMM: Of discovery or testimony?

22   MR. CANIS: Of the responses to ICI's data request.

23 BY MR. CANIS:

24 Q.   And this is in response to ICI 11 regarding Ameritech using

25 the same switch platform for services it offers through its

1   access tariff and services offered by any affiliate or

2   subsidiary in the provision of frame relay services.

3   The answer to that is "yes." Could I take this opportunity

4   to ask you to elaborate on that?

5   A.   I don't believe I answered this. I would maybe qualify

6   this a little bit by Ameritech offers frame relay one way and

7   that's via the tariff regardless of who's buying it.

8   Q.   Well, what is your -- Well, first off, let me ask, does

9   Ameritech, and let me direct this to counsel --

10   MR. CANIS: Does Ameritech have a witness that can

11 respond to these questions on the responses to data requests?

12   MR. STEMM: Well, I think this witness has just

13 answered your question, hasn't he?

14   MR. CANIS: So this is the appropriate witness for

15 further questions on this issue?

16   MR. STEMM: Well, I'll let -- I don't know. I don't

17 know what your next question is going to be. I think he

18 answered a question just now.

19   MR. CANIS: I just wanted to make sure that Mr. Wardin

20 wasn't the guy who answered this. Do we know who drafted these

21 responses?

22   MR. STEMM: Well, let me say this: You can ask

23 Mr. Wardin about this question, just as you may ask Mr. Whiting

24 about it.

25   MR. CANIS: I can ask a lot of people about it. What

1   I'm looking for is some indication from you as to are any of

2   your witnesses here the people who prepared these answers?

3   MR. STEMM: Mr. Whiting contributed to these answers,

4   yes.

5   MR. CANIS: Okay. Well, I'll continue with

6   Mr. Whiting then, yes.

7   THE WITNESS: I'll do my best.

8   BY MR. CANIS:

9   Q.   When we talk about the term "switch platform," what does

10 that mean to you?

11 A.   The actual physical switch.

12 Q.   To the best of your knowledge, does Ameritech maintain

13 separate switches for access intraLATA toll and local service,

14 frame relay service?

15 A.   The actual switch is the same, but the -- I guess the ports

16 into that switch would be different by -- could be different by

17 jurisdiction, whether it was a facility that we -- or a frame

18 relay component we sell to a carrier, or one we sell to an end

19 customer.

20 Q.   Can you explain, and it might be helpful to use the diagram

21 you put up earlier, how would Intermedia obtain a connection

22 through one of its customers, its frame relay customers, to one

23 of Ameritech's customers, frame relay customers within the same

24 LATA?

25 A.   I guess maybe I'm missing the point of what you're asking

1   me.   Within the same LATA?

2   Q.   (Nods head.)

3   A.   Well, today we don't really have that in place.

4   Q.   Right.

5   A.   So you're asking me --

6   Q.   That's exactly why we're here.   If we were to interconnect,

7   could you indicate -- could you draw a picture of how that would

8   take place?

9   A.   Sure.   Well, basically ICI would purchase -- and again,

10   that is why we're here, but in today's environment ICI would

11   purchase an NNI connection from the tariff similar to any other

12   Ameritech entity or affiliate and that would form that

13   connection between the switches.

14   Q.   Would that be the same as the NNI length that appears in

15   your diagram there?

16   A.   It would be the same on a couple of levels.   Again, what --

17   putting this together is the component of switching within a

18   LATA that's represented in the tariff.   The actual connection to

19   this component physically could be the same and logically would

20   be the same.   The only difference is ICI would be buying from

21   the tariff access to this component.

22   Q.   So basically I would have to interconnect at the serving

23   wire center, obtain a separate NNI connection to the AADS, is

24   that located in another building or --

25   A.   Yes.

1   Q.   Okay. So there is a transport component. If Ameritech

2   owned the switch and that switch existed in its central office,

3   would that obviate the need for me to buy that transport segment

4   to the AAD- -- to the switch?

5   A.   Well, there would have to be a transport component there to

6   get you from the entrance facility of the serving wire center to

7   the switch. I'm not sure how it impacts it. There needs to be

8   connectivity here. If this moves into here (indicating), I'm

9   not sure what that connectivity would be.

10   Q.   Do you know how other ILECs, other Bell operating companies

11   structure their frame relay services?

12   A.   Mostly from a pricing standpoint and a competitive offering

13   standpoint. Technically, no.

14   Q.   Do you know any others that have this AADS kind of

15   arrangement?

16   A.   I think loosely, from my understanding, U.S. West has a

17   separate subsidiary that places separate assets, even out of

18   region, here in Ohio. I believe BANI, Bell Atlantic Network

19   Integration, has something similar.

20   Q.   Are you familiar -- Well, let me ask you this: In your

21   opinion, would it be appropriate for Intermedia and Ameritech --

22   Let's assume that they have a T-1 trunk for purposes of

23   connectivity between the Intermedia office, Intermedia switch

24   and the Ameritech switch.

25   A.   Uh-huh.

1 Q. Would it be appropriate to split the cost of that, kind of

2 like a meet-point arrangement?

3   MR. STEMM: I would just object to the form of the

4 question, and correct me if I'm wrong, but you termed it the

5 Ameritech switch, and I don't think Ameritech has any frame

6 relay switches.

7 BY MR. CANIS:

8 Q. Let's say, as in this diagram, the Ameritech serving wire

9 center?

10 A. So talk me through that again.

11 Q. So basically Intermedia would be located up in the upper

12 right corner of the board, you have a T-1 link getting you into

13 the serving wire center. Would it be appropriate for the

14 carriers to share the cost of that line because they're trading

15 traffic with each other?

16 A. Kind of like a meet-point-type arrangement?

17 Q. Exactly, yes.

18 A. That may be appropriate.

19 Q. I just have one final question, this is on Page 21 of the

20 responses to the data request. And if you don't know, just say

21 you don't know. "The response contracts and other documents

22 sufficiently describing the arrangements between Ameritech and

23 AADS are attached. Ameritech objects to the production of

24 additional documents as irrelevant and unduly burdensome."

25   Do you have any idea what additional documentation was

1   referred to there?

2   A.   Specifically, I think once we start talking about

3   engineering plans, operations manuals and procedures, we may not

4   have provided because that's a very large amount of information.

5   MR. CANIS: All right. Thank you. I have no further

6   questions.

7   MEMBER SOLIMAN: I have one clarification that I need

8   from you. When you asked the witness the last question before.

9   MR. CANIS: Right.

10   MEMBER SOLIMAN: The one before the last question.

11   When you asked would it be reasonable to have sort of

12   arrangement like meet-point arrangements, are you -- were you

13   talking about the same point of interconnection you have for

14   switch -- for the switched services as the point of

15   interconnection, or you were talking about a separate point of

16   interconnection?

17   MR. CANIS: Actually, do you mind if I refer that

18   question to Dr. Viren?

19   MEMBER SOLIMAN: I was asking you for clarification of

20   your question.

21   MR. CANIS: The application that I had in mind was

22   purely for the provision of frame relay service and that was all

23   that I was referring to.

24   MEMBER SOLIMAN: Okay. That's the clarification I

25   needed. Thank you.

1   THE WITNESS: I have your copy.

2   MR. CANIS: Oh, thank you.

3   (Handed.)

4   THE WITNESS: And I think this is yours as well.

5   MR. CANIS: It is, thank you.

6   MEMBER SOLIMAN: I'm just going through my questions

7   because most of it has been asked already.

8   THE WITNESS: Sure.

9   (Pause.)

10   - - -

11   EXAMINATION

12   BY MEMBER SOLIMAN:

13   Q.   On the line of questions about routing, predetermined

14   routing tables and the distinction between a frame relay switch

15   service or not to switch service on your prefiled testimony on

16   Page 5, on the second full question and answer, "Are data link

17   connection identifiers similar to phone numbers?" The last two

18   sentences, you state "As a frame relay transmission completes

19   each step on this path, the DLCI," which is the data link

20   connection identifiers, "can change to let the system know where

21   the transmission is going next."

22   A.   Uh-huh.

23   Q.   My question here, would it be changed based on available

24   bandwidths, that because it's not -- the PVC is not available

25   one hundred percent of the time; so is that the reason it would

1   be changed?

2   A.   It would be changed -- the DLCI is the data link connection

3   identifier. They have local significance between two nodes,

4   whether that's a router and a switch or a switch and a switch;

5   so each one of those connections, those permanent connections

6   are done individual of each other. So it's not really dynamic

7   based on capacity; it's all predetermined.

8   Q.   It's all predetermined?

9   A.   Yes.

10   Q.   Thank you.

11   On Page 8, on the first question and answer, you're asking

12   "Would it be feasible for ICI to identify its permanent virtual

13   circuit as local or long distance...." And you're saying, near

14   to the end, "...there is no practical way for Ameritech to

15   determine what percentage of frame relay traffic over a given

16   physical circuit is local as opposed to long distance traffic."

17   A.   Uh-huh.

18   Q.   Can you explain why it's not technically feasible?

19   A.   It is technically feasible, but it might be an overwhelming

20   burden to put something in place to be able to police something

21   like that. It was a little oversimplified before, once you

22   start talking about calling a PVC local versus long distance,

23   because it really gets into what is going over those PVCs, the

24   amount of traffic.

25   For instance, you can have two garden hoses sitting side by

1   side, one's local, one's long distance and you have no idea

2   what's going through there. One is going to water your garden

3   real well; if there's no water flowing through it, it's going to

4   kill it.

5   What I'm trying to get at is it's not -- it's not that this

6   PVC is local, it's a matter of understanding the traffic. Once

7   we hand traffic off to another carrier such as ICI, there's no

8   real way to police where it goes next. So we have those PVC

9   that could be identified as local between our two switches, but

10 when it goes out the other end of the carrier switch, it could

11 be going to Tokyo.

12 Q.   Is there any identifier within the frame itself that can

13 flag?

14 A.   Well, that's when you get into technical feasibility.

15 There probably is a way to capture statistics off our switches.

16 I've talked to our switch vendors who we share the same vendor,

17 you can capture the bulk statistics of putting in some

18 methodology in place to make use of that bulk statistics, store

19 that huge amount of data. It makes it impractical in my

20 opinion, so....

21 Q.   So today, as of Ameritech's and AADS's equipment and

22 facilities, you cannot determine if a PVC is a local or toll?

23 A.   Yeah, it's hard -- we cannot -- We do not have a handle on

24 whether the traffic over those PVC and what we have to

25 differentiate is the actual path and what's going over that

1 path. We certainly can designate, but there's no way to know,

2 and so we make assumptions.

3   And the comment made earlier, customers have a hard time

4 knowing what's going on their data network, that's true. We

5 make some guesses and we make some assumptions. For instance,

6 it's extremely unlikely that a business would have locations

7 just in one LATA and never communicate outside that LATA.

8 Q.   So are you proposing here, or is it your position that you

9 should have separate PVCs for separate types of traffic?

10 A.   That, again, what I'm trying to say here is even if you

11 have separate PVCs there's really no way to know what's going on

12 in those PVCs.

13 Q.   Would the traffic's ultimate destination address be

14 included within the frame when first the data transmitted from

15 the originating --

16 A.   Only the next stop, the next switch, and then it could

17 change.

18 Q.   So you never have -- technically, you do not have the

19 ultimate destination address?

20 A.   I believe through network management you'd be able to

21 capture that, but again, you get back to a practical, where are

22 you going to store all that data, what are you going to do with

23 that data?

24 Q.   When either an end user or another carrier purchase frame

25 relay service, and you establish PVCs, don't you have in your

1 predetermined routing table the originating and terminating end

2 of that data transmission?

3 A.   Just in and out of the switch. The next stop could be

4 another switch that goes somewhere else. The next stop could be

5 a customer's router, and then they turn around and send it

6 someplace else. So it's only locally significant.

7   MEMBER SOLIMAN: Thank you very much.

8   THE WITNESS: You're very welcome.

9   - - -

10   EXAMINATION

11 BY EXAMINER JENNINGS:

12 Q.   Just one question that -- I it take from your previous

13 responses that you know the answer to this.

14   You indicated there could be no limitations LATA-wise with

15 respect to transmission in a frame relay service, and my

16 question is: Can frame relay service be exchange based or

17 limited to an exchange, have any relation to exchange?

18 A.   Again, it gets down to limiting the path versus having the

19 understanding of the traffic. There can be a path within an

20 exchange, but the traffic transversing that path you don't know

21 where it's going next.

22   So for instance, a connection between two carriers,

23 intraLATA within an exchange, we could set up a PVC that is just

24 for traffic within the exchange, but once it gets handed off,

25 you know, there's no way to really -- no practical way to really